IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

DARIAN WOODBRIGHT, ET AL., *on behalf of themselves and all others similarly situated*,	§	
Plaintiffs,	§	
v.	§	Civil Action No. 4:24–CV–04611
	§	Judge Ellison
HEALTH MATCHING ACCOUNT SERVICES, INC.,	§	
Defendant.	§	

Declaration of Dennis P. Duffy

1. My name is Dennis P. Duffy. I am over 18 years old and am in all ways competent to make this Declaration. I am an attorney of record for Defendant Health Matching Account Services, Inc. (**HMAS**), in the above-reference action. I submit this Declaration in Support of HMAS' Motion to Quash or Modify Subpoena and for Protective Order. I have personal knowledge of the facts set forth within this Declaration. The facts stated herein are true and correct to the best of my knowledge.

2. On August 22, 2025 and August 29, 2025, Andrea Johnson and I attempted to confer with Plaintiffs' counsel of record, Alexander Loftus and Carl Johnson, regarding the Subpoena (**Subpoena**) Plaintiffs served upon Plains Capital Bank (the Bank") and HMAS' intention to file a Motion to Quash or Modify Subpoena and for Protective Order. Attached hereto as **Exhibits A through K** are true and correct copies of the Subpoena at issue, and of email communications between myself, my co-counsel, Ms. Andrea Johnson, counsel for the Plaintiffs, Mr. Alexander Loftus and Mr. Carl Johnson, and counsel for the Bank, regarding the Subpoena and attempts to discuss and resolve the issues with respect to HMAS' Motion to Quash or Modify Subpoena and for Protective Order.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the foregoing is true and correct.

Signed on September 5, 2025 in Houston, Texas.

Dennis P. Duffy